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February 11, 2018

Commissioners

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

RE: Comments on PSHSB 17-344

Ladies and Gentlemen,

I am writing to urge the Commission to dismiss proposals that would permit wideband digital modes on narrowband HF frequencies. The following arguments were prepared by Peter S Alterman, W2CDO and were previously submitted. I fully support these arguments.

The particular issues that make wideband modes in narrowband HF frequencies incompatible with all other services, especially during emergencies are:

Impede, Rather than Improve Emergency Communications:

Unattended wideband modes, e.g., Winlink, require expensive equipment at both ends of the communications path. This equipment is available through a single manufacturer. This limits the number of stations that can deploy such a mode during an emergency. On the other hand, most amateur radio stations on either side of a communications channel during an emergency have the necessary equipment, available from a wide variety of manufacturers (and even home brewed equipment) to successfully communicate.

Not Efficient: Winlink wideband modes are not efficient. They consume limited HF frequencies dedicated to narrowband communications. In fact, these modes have a bandwidth footprint that is comparable to SSB voice bandwidth and therefore would be better located within those subbands, if anywhere.

Encryption: Winlink modes are encrypted modes. Encrypted transmissions are explicitly forbidden by Part 97. More germane at this point in time is that the Defense, Intelligence and Law Enforcement authorities of the United States aggressively oppose any expansion of encrypted communications of any sort and this position is a vexed issue at the highest levels of government. A corollary argument that has been put forward regards a putative need for encrypted communications to satisfy HIPAA privacy communications requirements. The Centers for Medicare and Medicaid Services, DHHS, which is responsible for HIPAA regulation and the Office of Civil Rights, DHHS, which is responsible for policing

HIPAA compliance, do not classify amateur radio communications as Covered Entities under HIPAA. That means that such communications when used to exchange data regarding a patient are not subject to HIPAA regulations or the Privacy Act regarding protection of personally identifiable information. Any argument made on these grounds should be immediately dismissed as misleading.

Unavoidable Harm to Thousands of Active Operators: Winlink, indeed any unattended mode, interfere with ongoing narrowband communications in HF. This also is a violation of Part 97 regulations governing the behavior of amateur communications. Narrowband communications modes are not compatible with the bandwidth demands of wideband digital modes. Tens of thousands of amateur radio operators will be unavoidably harmed if unattended and wideband digital modes are allowed free rein in narrowband HF frequencies. This is clearly not in the best interests of the amateur community.

Unnecessary Regulation: Finally, the Commission has the authority to direct waivers and special permissions to allow or disallow any communication and mode anywhere within the amateur frequency allocations during times of emergencies. There is no need for a regulation giving special privileges sought by special interests advancing their monopolistic mode on the basis of emergency communications service.

Respectfully,

Robie Elms – AJ4F

ARRL Life Member